

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

In re: Lance Patrick Alexander and
Terri Ann Alexander,
Debtors,

Lance Patrick Alexander and
Terri Lynn Alexander,
Movants,

v.

Ronda J. Winnecour, Chapter 13 Trustee,

Respondents,

Bankruptcy No. 17-21820-JAD

Chapter 13

Related to DD No. 145 and 148

STIPULATION CONCERNING DEBTORS' AMENDED CLAIM OF EXEMPTIONS

AND NOW the Debtors Lance and Terri Alexander as well as the Standing Chapter 13 Trustee Ronda J. Winnecour, through their respective counsel, file the within stipulation concerning the Debtors' amended claim of exemptions filed at DD No. 138, and the Trustee's Objection to said Exemptions at DD No. 145. Pursuant to said Stipulation, the parties aver the following:

WHEREAS, the Debtors filed an amended claim of exemptions for the debtor Wife Terri Lynn Alexander at DD No. 138, containing additional exemptions claimed related to a defective medical device claim at line 34.2;

WHEREAS, the Debtor Wife's exemptions related to Line 34.2 are listed at 100% Fair Market value, instead of providing a fixed value;

WHEREAS, after discussion between counsel for the Debtors and counsel for the chapter 13 Trustee, the parties agree these exemptions should have a fixed value listed;

THEREFORE, the Debtors and the Chapter 13 Trustee stipulate as follows:

1. The exemption claim related to schedule B, Line 34.2, based on 11 USC §522(d)(5) is amended to provide for an exemption claim of \$13,100 from the Debtor Wife's available exemptions.
2. The exemption claim related to Schedule B, Line 34.2, based on 11 USC §522(d)(11)(D), is amended to provide for an exemption claim of \$23,675 from the Debtor Wife's available exemptions.
3. The Office of the Chapter 13 Trustee shall have 30 days from the date of this stipulation to object to either of the above-listed exemptions.

WHEREFORE, the Debtor and the Chapter 13 Trustee so stipulate, and present said stipulation to this Court.

Date: July 28, 2021

Respectfully Submitted,

/s/David A. Colecchia
David A. Colecchia, Esq.
David A. Colecchia and Associates
324 South Maple Ave.
Greensburg, PA 15601
724-837-2320
PA.I.D.No. 71830
colecchia542@comcast.net

SO ORDERED.

RONDA WINNECOUR, CHAPTER 13 TRUSTEE

7/30/2021



Jeffery A. Deller
U.S. Bankruptcy Judge

By: /s/ Owen W. Katz
Owen W. Katz, PA I.D. 36473
Attorney for Chapter 13 Trustee
US Steel Tower, Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
Email: okatz@chapter13trusteewdpa.com

FILED
7/30/21 11:08 am
CLERK
U.S. BANKRUPTCY
COURT - WDPA

In re:
Lance Patrick Alexander
Terri Ann Alexander
Debtors

Case No. 17-21820-JAD
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0315-2
Date Rcvd: Jul 30, 2021

User: dkam
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
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+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
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Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 01, 2021:

Recip ID	Recipient Name and Address
db/jdb	+ Lance Patrick Alexander, Terri Ann Alexander, 114 Bouquet Street, Ligonier, PA 15658-1209

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 01, 2021

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 30, 2021 at the address(es) listed below:

Name	Email Address
Brian Nicholas	on behalf of Creditor Pennymac Loan Services LLC bnicholas@kmlawgroup.com
Celine P. DerKrikorian	on behalf of Creditor Plaza Home Mortgage Inc. ecfmil@mwc-law.com
David A. Colecchia	on behalf of Joint Debtor Terri Ann Alexander colecchia542@comcast.net dcolecchia@my-lawyers.us;jmonroe@my-lawyers.us;sshipley@my-lawyers.us;skerr@my-lawyers.us
David A. Colecchia	on behalf of Debtor Lance Patrick Alexander colecchia542@comcast.net dcolecchia@my-lawyers.us;jmonroe@my-lawyers.us;sshipley@my-lawyers.us;skerr@my-lawyers.us
Jerome B. Blank	on behalf of Creditor Pennymac Loan Services LLC pawb@fedphe.com

District/off: 0315-2

User: dkam

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Date Rcvd: Jul 30, 2021

Form ID: pdf900

Total Noticed: 1

Lauren Moyer

on behalf of Creditor Plaza Home Mortgage ecfmail@ecf.courtdrive.com

Maria Miksich

on behalf of Creditor Pennymac Loan Services LLC mmiksich@kmlawgroup.com

Mario J. Hanyon

on behalf of Creditor Pennymac Loan Services LLC wbecf@brockandscott.com, mario.hanyon@brockandscott.com

Office of the United States Trustee

ustpreion03.pi.ecf@usdoj.gov

Ronda J. Winnecour

cmecf@chapter13trusteedpa.com

S. James Wallace

on behalf of Creditor Peoples Natural Gas Company LLC ecfpeoples@grblaw.com PNGbankruptcy@peoples-gas.com

Thomas Song

on behalf of Creditor Pennymac Loan Services LLC pawb@fedphe.com

TOTAL: 12